May 27, 2003

Re: Schwab Corporation 123-16917-000118

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

May 27, 2003

Mr. Randy Engler
Schwab Corporation
P. O. Box 5088
Lafayette, Indiana 47903-5088

Re: 123-16917
Second Minor Permit Modification to
Part 70 No.: T 123-7304-00018

Dear Mr. Engler:

Schwab Corporation was issued a permit on May 5, 1998 for a stationary metal office products manufacturing operation. A letter requesting changes to this permit was received on July 22, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding one (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

The following are the changes that will be made to the permit. All new language is indicated in bold type. All deleted information is struck-out.

1. Condition A.2:

The proposed paint booth shall be added to the unit description of Condition A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

.....

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

2. Section D.1 Unit Description:

The proposed paint booth shall be added to the Section D.1 unit description.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

.....

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

3. Condition D.1.1a:

On January 19, 1999, a Minor Permit Modification (123-9873-00018) was issued for Schwab Corporation which removed paint booth POB. Schwab Corporation is now requesting that Paint booth POB be repermitted.

As part of the removal process under 9873, the reviewer added condition D.1.1a which states “any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration)”.

After Minor Permit Modification 9873 was issued, the source was still determined to be major for PM, PM10, and VOC. Thus, if the source wishes to add booth POB to their source, they can do so without going through Prevention of Significant Deterioration (PSD) review provided all emissions associated with the proposed booth are less than the respective significant levels.

Adding the booth will not in itself, trigger PSD review as stated in Condition D.1.1a.

Condition D.1.1a also states that use of paint booth POB shall be discontinued. This statement is no longer applicable because the source is proposing to re-permit paint booth POB.

Therefore, since adding the booth will not in itself trigger PSD review and the statement that the use of paint booth POB is no longer applicable, Condition D.1.1a shall be removed.

~~D.1.1a Volatile Organic Compound (VOC) [326 IAC 2-2]~~

~~The use of the one (1) post office spray booth (POB) shall be permanently discontinued. Any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Quality before such change or modification can occur.~~

4. Condition D.1.2:

New Condition D.1.2 shall be added as follows to include the 326 IAC 8-2-6 applicable requirements.

D.1.2 Volatile Organic Compounds, Paint Booth (POB) [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6, the VOC content of the coatings applied at Paint Booth POB shall not exceed 3.0 pounds per gallon, excluding water.

5. Condition D.1.4:

New Condition D.1.4 shall be added as follows to include the new 326 IAC 6-3-2 applicable requirements.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), surface coating booth (POB) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device with said control device being operated in accordance with the manufacturer's specifications.

6. Condition D.1.5:

New Condition D.1.5 shall be added as follows to include the compliance determination requirements associated with the new 326 IAC 8-2-6 limit.

D.1.5 Compliance Determination, Paint Booth (POB) VOC Content Limit

To determine compliance with the limit of Condition D.1.2, the owner or operator shall complete as applied VOC data sheets for the worst case scenario of each coating applied at paint booth POB.

7. Condition D.1.6:

Condition D.1.3 (now Condition D.1.6) shall be modified as follows to require the owner or operator to demonstrate compliance with the new 326 IAC 8-2-6 limit if deemed necessary.

D.1.3**6** Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) or particulate matter (PM) limits specified in Conditions D.1.1**,** ~~and~~ D.1.2**, and D.1.3,** shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

8. Condition D.1.7:

Condition D.1.4 (now Condition D.1.7) shall be modified as follows to require the owner or operator to operate the dry filter system of the proposed booth at all times when the booth is in operation.

D.1.~~4~~**7** Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the two (2) paint booths (FB and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when ~~the one (1)~~ patch (grinding) booth **and paint booth (POB)** ~~is~~**are** in operation.

9. Condition D.1.8:

Condition D.1.5 (now Condition D.1.8) shall be modified as follows to require the owner or operator to perform daily visible emission notations of the proposed booth stack exhaust.

D.1.~~5~~**8** Visible Emissions Notations

(a) Daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), **paint booth POB,** and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

10. Condition D.1.10:

New Condition D.1.10 shall be added as follows to include the compliance monitoring requirements associated with the new 326 IAC 8-2-6 limit.

D.1.10 Compliance Monitoring, Paint Booth (POB) VOC Content Limit

To demonstrate compliance with the limit of Condition D.1.2, the owner or operator shall, for each coating formulation change that results in a new worst case as applied scenario, update the VOC data sheets required in Condition D.1.5.

11. Condition D.1.11:

Condition D.1.7 (now Condition D.1.11) shall be added as follows to include the record keeping requirements associated with the new 326 IAC 8-2-6 limit and to renumber the conditions referenced in this condition to their new respective numbers.

D.1.~~7~~**11** Record Keeping Requirements

(a) To document compliance with Condition D.1.~~2~~**3** and D.1.~~6~~**9**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with the VOC limit of Condition D.1.2, the owner or operator shall maintain the most recent updated as applied VOC data sheets required in Condition D.1.10.

(~~b~~**c**) To document compliance with Condition D.1.~~5~~**8**, the Permittee shall maintain records of daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(~~c~~**d**) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken

monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(~~d~~**e**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

12. Condition Renumbering:

All Conditions have been renumbered appropriately.

13. Table of Contents:

The Table of Contents has been modified to reflect the new condition numbering.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact SDF, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File -Perry County
U.S. EPA, Region V
Perry County Health Department

Southwest Regional Office
Air Compliance Section Inspector - Scott Anslinger
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
Office of Air Quality

Schwab Corporation
Route 66 East
Cannelton, Indiana 47530

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T123-7304-00018	Date Issued: May 5, 1998

First Minor Permit Modification No.: 123-9837-00018	Date Issued: January 19, 1999

First Administrative Amendment No.: 123-10301-00018	Date Issued: March 22, 1999

Second Administrative Amendment No.: 123-14052-00018	Date Issued: April 20, 2001

Second Minor Permit Modification No.: 123-16917-00018	Pages Affected: 3, 4, 27, 28, 29, with page 29a added
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	May 27, 2003

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal office products manufacturing operation

Responsible Official:	Randy Engler
Source Address:	Route 66 East, Cannelton, Indiana 47530
Mailing Address:	P.O. Box 5088, Lafayette, Indiana 47903-5088
SIC Code:	3499
County Location:	Perry
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

(2) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(3) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(4) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(5) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]

[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);

(2) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);

(3) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;

(4) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and

(5) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Any change or modification to spray booth (FB) or the one (1) mixer (MX) must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):

(1) The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.

(2) Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is

complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds, Paint Booth (POB) [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6, the VOC content of the coatings applied at Paint Booth POB shall not exceed 3.0 pounds per gallon, excluding water.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB), the one (1) complete safe painting spray booth (PB), the one (1) mixer for dry and wet insulation (fire proofing) ingredients, the one (1) patch (grinding) booth (GB), the one (1) glass shot blast for cleaning, and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), surface coating booth (POB) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device with said control device being operated in accordance with the manufacturer's specifications.

Compliance Determination Requirements

D.1.5 Compliance Determination, Paint Booth (POB) VOC Content Limit

To determine compliance with the limit of Condition D.1.2, the owner or operator shall complete as applied VOC data sheets for the worst case scenario of each coating applied at paint booth POB.

D.1.6 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) or particulate matter (PM) limits specified in Conditions D.1.1, D.1.2, and D.1.3, shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the two (2) paint booths (FB and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when patch (grinding) booth and paint booth (POB) are in operation.

D.1.8 Visible Emissions Notations

(a) Daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), paint booth POB, and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.9 Monitoring

(a) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.10 Compliance Monitoring, Paint Booth (POB) VOC Content Limit

To demonstrate compliance with the limit of Condition D.1.2, the owner or operator shall, for each coating formulation change that results in a new worst case as applied scenario, update the VOC data sheets required in Condition D.1.5.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.3 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with the VOC limit of Condition D.1.2, the owner or operator shall maintain the most recent updated as applied VOC data sheets required in Condition

D.1.10.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(d) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for

a Minor Source Modification to a Part 70 Permit
and
a Minor Permit Modification to a Part 70 Permit

Source Background and Description

Source Name:	Schwab Corporation
Source Location:	Route 66 East in Cannelton, Indiana 47530
County:	Perry
SIC Code:	3499
Part 70 Permit No.:	123-7304-00018
Operation Permit Issuance Date:	May 5, 1998
Minor Source Modification No.:	123-16243-00018
Minor Permit Modification No.:	123-16917-00018
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a Minor Source Modification and Minor Permit Modification application from Schwab Corporation relating to the operation of their stationary metal office products manufacturing operation.

Request

On July 22, 2002, Schwab Corporation submitted an application to re-install:

One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

The proposed booth will not generate any increases in production or emissions from any existing emission units. The coatings applied are water-based coatings that contain no regulated hazardous air pollutants (HAP).

Therefore, the emissions due to the proposed modification are the particulate matter (PM), PM10, and volatile organic compound (VOC) emissions generated by the proposed surface coating booth.

The PM, PM10, and VOC unrestricted potential to emit due to the proposed modification changes are estimated to be 9.75, 9.75, and 7.65 tons per year, respectively.

The PM and PM10 emissions are greater than the low end applicable level of 5 tons/yr but less than upper end level of 25 tons/yr and the VOC emissions are less than the applicable level of 10 tons/yr. Therefore, the proposed modification shall be approved via a Minor Source Modification pursuant to 326

IAC 2-7-10.5(d)(4)(A).

The equipment of this proposed modification shall be incorporated into the existing Part 70 permit via a Minor Permit Modification pursuant to 326 IAC 2-7-12.

Existing Approvals

The source has been operating under Part 70 permit 123-7304-00018, issued on May 5, 1998, 1st Minor Permit Modification 123-9837-00018, issued on January 19, 1999, 1st Administrative Amendment 123-10301-00018, issued on March 22, 1999, and 2nd Administrative Amendment 123-14052-00018, issued on April 20, 2001.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information received on September 9, 2002.

Emission Calculations

1. Unrestricted Potential to Emit (UPTE) Due to the Modification:

The unrestricted potential to emit (UPTE) due to the proposed modification are the PM, PM10, and VOC emissions from the proposed paint booth.

The coatings are water-based and contain no regulated hazardous air pollutants (HAP).

a. VOC Emissions:

The following calculations determine the paint booth VOC UPTE based on use of the worst case coating combination, the chemical properties of the coatings as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

VOC (tons/yr) = lb/gal * fraction VOC * gal/unit * unit/hr * 8760 hr/yr * 1/2000 ton/lb

Coating	lb/gal	fraction VOC	maximum gal/unit	maximum unit/hr	VOC (ton/yr)
39899	10.26	0.09	0.023	51	4.74
39931	9.93	0.15	0.023	51	**7.65**
39865	10.01	0.10	0.023	51	5.14
39863	10.43	0.09	0.023	51	4.82

b. PM/PM10:

The following calculations determine the paint booth PM(PM10) UPTE based on use of the worst case coating combination, the chemical properties of the coatings as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

PM (tons/yr) = lb/gal * gal/unit * unit/hr * (1 - wt% VOC) * (1 - 0.80) * 8760 hr/yr * 1/2000

Coating	lb/gal	maximum gal/unit	maximum unit/hr	Fraction VOC	transfer efficiency (TE)	PM* (ton/yr)
39899	10.26	0.023	51	0.09	80%	9.59
39931	9.93	0.023	51	0.15	80%	8.67
39865	10.01	0.023	51	0.10	80%	9.26
39863	10.43	0.023	51	0.09	80%	**9.75**

* PM10 is determined to be equal to PM.

2. Emissions After Controls:

The PM/PM10 emissions are controlled by a dry filter system with an overall control efficiency of 70%.The following calculations determine the PM(PM10) emissions after controls based on 70% overall control efficiency and the estimated emissions before controls.

PM tons/yr = emissions before controls (tons/yr) * (1 - 0.70)

= 9.75 * 0.30

= 2.93 tons PM*/yr

* PM10 is determined to be equal to PM in this case.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	9.75
PM-10	9.75
SO_2	-

VOC	7.65
CO	-
NO_x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The PM and PM10 emissions are greater than the low end applicable level of 5 tons/yr but less than upper end level of 25 tons/yr and the VOC emissions are less than the applicable level of 10 tons/yr. Therefore, the proposed modification shall be approved via a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(4)(A).

The equipment of this proposed modification shall be incorporated into the existing Part 70 permit via a Minor Permit Modification pursuant to 326 IAC 2-7-12.

County Attainment Status

The source is located in Perry County.

Pollutant	Status
PM_{10}	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.

(b) Perry County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>250	>250	<100	<100	>250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

(a) The existing source is a major PSD stationary source because the PM, PM10, and VOC emissions are greater than the applicable level or 250 tons per year or more and it is not one of the 28 listed source categories.

(b) This existing source is a Title V major stationary source because the PM, PM10, and VOC emissions are greater than the applicable level of 100 tons per year and the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Emissions Due to the Modification

Emissions due to the modification (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	9.75	9.75	-	-	7.65	-	-	-

PSD Sig. Levels	25	15	40	40	40	100	-	-

(a) The PM and PM10 emissions are controlled by dry a filter system with an overall control efficiency of 70%.

(b) The modification is not a major PSD modification because none of the regulated pollutants exceed their respective significant applicable levels.

Emissions After the Modification

Source emissions after the modification (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>250	>250	<100	<100	>250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

(a) The source after the modification is still a major PSD stationary source because the PM, PM10, and VOC emissions are still greater than the applicable level or 250 tons per year or more and the source is not one of the 28 listed source categories.

(b) This source after the modification is still a Title V major stationary source because the PM, PM10, and VOC emissions are still greater than the applicable level of 100 tons per year and the single and combined HAP emissions still exceed the respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that apply to the proposed source.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that apply to this proposed source.

State Rule Applicability, Entire Source

1. 326 IAC 2-2 (Prevention of Significant Deterioration)

   The proposed modification is not a major PSD modification because none of the regulated pollutants exceed their respective significant applicable levels.

2. 326 IAC 2-6 (Emission Reporting)

   This source is still subject to the requirements of 326 IAC 2-6 (Emission Reporting) because the PM10 and VOC potential to emit, each, still exceed the applicable level of 100 tons per year.

3. 326 IAC 2-7-5(13) (Preventive Maintenance Plan)

   The source is still required to have a Preventive Maintenance Plan (PMP) meeting the requirements specified in 326 IAC 2-7-5(13).

4. 326 IAC 5-1 (Visible Emissions Limitations)

   The source is still subject to the requirements of 326 IAC 5.

State Rule Applicability - Individual Facilities

1. 326 IAC 8-2-9 (Miscellaneous Metal Coating):

   Although the proposed spray booth (POB) is part of a source whose Standard Industrial Classification Code Major Group (3499) is one of the applicable major groups listed in 326 IAC 8-2-9(a)(5), this rule does not apply because the proposed booth is exempted under 326 IAC 8-2-9(b)(1) which states any metal parts or products limited by other Sections under 326 IAC 8-2 are exempt from the requirements of 326 IAC 8-2-9.

The proposed spray booth is subject to the requirements of 326 IAC 8-2-6.

2. 326 IAC 8-2-6 (Metal Furniture Coating Operations)

The proposed spray booth (POB) is subject to the requirements of 326 IAC 8-2-6 because the booth will be constructed after the applicable date of January 1, 1980 and the proposed booth will coat furniture made of metal or metal parts which will be assembled with other metal, wood, fabric, plastic, or glass parts to form a furniture piece.

Pursuant to 326 IAC 8-2-6, the VOC content of the coatings shall not exceed 3.0 pounds per gallon, excluding water.

The VOC content of the coatings of booth POB are listed in the table below.

Coating	VOC Content (lb/gal less water)
39899	1.90
39931	1.88
39865	1.92
39863	1.69

The respective VOC contents are less than the applicable level of 3.0 lb/gal. Thus, compliance is determined to be achieved.

3. 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(d), the proposed surface coating booth (POB) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device.

The source operating permit is a Part 70 permit under 326 IAC 2-7. Thus, pursuant to 326 IAC 6-3-2(d)(3), the requirements of 326 IAC 6-3-2(d)(2) do not apply.

The proposed booth is therefore only subject to the additional requirements of 326 IAC 6-3-2(d)(1).

Pursuant to 326 IAC 6-3-2(d)(1), the owner or operator shall operate the control device in accordance with the manufacturer's specifications.

Changes to the Permit

1. Condition A.2:

The proposed paint booth shall be added to the unit description of Condition A.2.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

……..

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

2. Section D.1 Unit Description:

The proposed paint booth shall be added to the Section D.1 unit description.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2); .....

(6) One (1) surface coating booth, identified as POB, applying water-based surface coatings at a design throughput rate of 51 units per hour, with particulate emissions controlled by a dry filter system, and all emissions exhausted through Stack SV-4.

3. Condition D.1.1a:

On January 19, 1999, a Minor Permit Modification (123-9873-00018) was issued for Schwab Corporation which removed paint booth POB. Schwab Corporation is now requesting that Paint booth POB be repermitted.

As part of the removal process under 9873, the reviewer added condition D.1.1a which states “any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration)”.

After Minor Permit Modification 9873 was issued, the source was still determined to be major for PM, PM10, and VOC. Thus, if the source wishes to add booth POB to their source, they can do so without going through Prevention of Significant Deterioration (PSD) review provided all emissions associated with the proposed booth are less than the respective significant levels.

Adding the booth will not in itself, trigger PSD review as stated in Condition D.1.1a.

Condition D.1.1a also states that use of paint booth POB shall be discontinued. This statement is no longer applicable because the source is proposing to re-permit paint booth POB.

Therefore, since adding the booth will not in itself trigger PSD review and the statement that the use of paint booth POB is no longer applicable, Condition D.1.1a shall be removed.

~~D.1.1a Volatile Organic Compound (VOC) [326 IAC 2-2]~~

~~The use of the one (1) post office spray booth (POB) shall be permanently discontinued. Any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Quality before such change or modification can occur.~~

4. Condition D.1.2:

New Condition D.1.2 shall be added as follows to include the 326 IAC 8-2-6 applicable requirements.

D.1.2 Volatile Organic Compounds, Paint Booth (POB) [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6, the VOC content of the coatings applied at Paint Booth POB shall not exceed 3.0 pounds per gallon, excluding water.

5. **Condition D.1.4:**

New Condition D.1.4 shall be added as follows to include the new 326 IAC 6-3-2 applicable requirements.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), surface coating booth (POB) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device with said control device being operated in accordance with the manufacturer's specifications.

6. **Condition D.1.5:**

New Condition D.1.5 shall be added as follows to include the compliance determination requirements associated with the new 326 IAC 8-2-6 limit.

D.1.5 Compliance Determination, Paint Booth (POB) VOC Content Limit

To determine compliance with the limit of Condition D.1.2, the owner or operator shall complete as applied VOC data sheets for the worst case scenario of each coating applied at paint booth POB.

7. **Condition D.1.6:**

Condition D.1.3 (now Condition D.1.6) shall be modified as follows to require the owner or operator to demonstrate compliance with the new 326 IAC 8-2-6 limit if deemed necessary.

D.1.3**6** Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) or particulate matter (PM) limits specified in Conditions D.1.1**,** ~~and~~ D.1.2**, and D.1.3,** shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

8. **Condition D.1.7:**

Condition D.1.4 (now Condition D.1.7) shall be modified as follows to require the owner or operator to operate the dry filter system of the proposed booth at all times when the booth is in operation.

D.1.4**7** Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

(a) The water wash wall for PM control shall be in operation at all times when the two (2) paint booths (FB and PB) are in operation.

(b) The dry filters for PM control shall be in operation at all times when ~~the one (1)~~ patch (grinding) booth **and paint booth (POB)** ~~is~~**are** in operation.

9. Condition D.1.8:

Condition D.1.5 (now Condition D.1.8) shall be modified as follows to require the owner or operator to perform daily visible emission notations of the proposed booth stack exhaust.

D.1.~~5~~**8** Visible Emissions Notations

(a) Daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) mixer (MX), **paint booth POB,** and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

10. Condition D.1.10:

New Condition D.1.10 shall be added as follows to include the compliance monitoring requirements associated with the new 326 IAC 8-2-6 limit.

D.1.10 Compliance Monitoring, Paint Booth (POB) VOC Content Limit

To demonstrate compliance with the limit of Condition D.1.2, the owner or operator shall, for each coating formulation change that results in a new worst case as applied scenario, update the VOC data sheets required in Condition D.1.5.

11. Condition D.1.11:

Condition D.1.7 (now Condition D.1.11) shall be added as follows to include the record keeping requirements associated with the new 326 IAC 8-2-6 limit and to renumber the conditions referenced in this condition to their new respective numbers.

D.1.~~7~~**11** Record Keeping Requirements

(a) To document compliance with Condition D.1.~~2~~**3** and D.1.~~6~~**9**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with the VOC limit of Condition D.1.2, the owner or operator shall maintain the most recent updated as applied VOC data sheets required in Condition D.1.10.

(~~b~~**c**) To document compliance with Condition D.1.~~5~~**8**, the Permittee shall maintain records of daily visible emission notations of the two (2) spray booths (FB, and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.

(~~c~~**d**) To document compliance with Condition D.1.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(~~d~~**e**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

12. Condition Renumbering:

All Conditions have been renumbered appropriately.

13. Table of Contents:

The Table of Contents has been modified to reflect the new condition numbering.

Conclusion

The proposed booth (POB) shall be constructed and operated under the requirements of the existing operating permit, the applicable approvals issued after the original permit, Minor Source Modification 123-16243-00018, and Minor Permit Modification 123-16917-00018.